COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BAY STATE GAS COMPANY

D.T.E. 05-27

ATTORNEY GENERAL'S TWENTY FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's 21st SET of discovery and information requests.

AG-21-1 Provide a list identifying any meter reading inaccuracies associated with the Metscan devices. The list should identify the magnitude of the inaccuracies by class and include dates corresponding to the inaccurate recordings as well as dates the associated billing adjustments were made. Provide all work papers, calculations and assumptions relating to the corresponding billing adjustments necessary to account for such inaccurate recordings.

AG-21-2 Please provide copies of all correspondence and reports associated with Metscan meter reading inaccuracies that the Company has filed with the Department and any associated Department Orders.

AG-21-3 Provide a list and description of customer complaints as well as any refunds associated with Metscan, including reimbursement of telephone bills.

AG-21-4 Regarding the functionality of Metscan, explain how often the device transmits information and whether the device interrupts the customer's phone/internet service.

AG-21-5 Identify the costs associated with the transmission of information over the phone line and whether the customer pays for the associated costs. Identify any circumstances which would cause the customer to pay long distance services for the use of this device.

AG-21-6 Refer to AG -3-32(b), p. 9. The Company states that the average volume of

long reads and customer complaints over the past 2 years was 15,777, giving a total average cost of $346,606. Please provide all workpapers, calculations and assumptions used by the Company to calculate these numbers.

AG-21-7 Please provide a chart depicting the number of long reads, re-reads and customer complaints and associated costs since the deployment of Metscan devices.

AG-21-8 Refer to AG-3-32(b), p. 12. The Company lists an Itron charge and desktop fixes under O&M related costs. Please explain what these costs entail.

AG-21-9 Refer to AG-3-32(b), p. 13. The Company states that outside devices are 30 times more likely to fail after the first PT cycle. Define PT cycle.

AG-21-10 Refer to AG-3-32(b), p. 14 and the Company's response to AG-03-33. On what basis did the Company believe that the installation is assumed to last 42 years given that the Metscan devices were purchased with a standard one year warranty.

AG-21-11 Refer to AG-3-32(b), p. 15. The Company identifies the no call rate as 17.3%. Define the no call rate and provide all workpapers, calculations and assumptions employed by the company to calculate this percentage.

AG-21-12 Refer to AG-3-32(b), p. 22. The Company states that it continues to utilize Metscan devices for all transportation/daily read customers. Provide all Company memoranda that identifies or describes the Company's decision to continue to use Metscan devices for large customers taking daily metered transportation service and/or service under the Co.'s Extra High Annual C&I rate schedules.

AG-21-13. Refer to AG-3-32(b), p. 23. The Company states that an increasing percentage of outside meters will improve PBR targets. Provide the rationale behind this assertion.

AG-21-14 Refer to AG-3-32(b), p. 23. Regarding the chart titled NIPSCO Meter Reading Success Rate, identify the type of meter reading devices used by NIPSCO. Provide workpapers, calculations and assumptions used by the Company to create the chart.

AG-21-15 Refer to AG-3-32(b), p. 27. Identify by year the number and percentage of devices that failed due to initial problems identified on this page.

AG-21-16 Refer to AG-3-32(b), p. 28. The Company states that in some circumstances the devices worked at first but then failed due to premature battery failure (due to

excessive phone calls or water damage) and environmental damage. Regarding the premature battery failure, define excessive phone calls and explain how that causes battery failure. Regarding environmental damage, identify the causes of such damage and how it differs from water damage. Identify by year the number and percentage the instances of device failure due to premature battery failure and environmental damage.

AG-21-17 Refer to AG-3-32(b), p. 30. Define excessive phone problems and identify the number of Metscan devices that the Company removed from customer homes due to excessive phone problems.

AG-21-18 Refer to AG-3-32(b), p. 36. The Company states that the costs of continuing to use operating Metscan devices on inside meters is lower but that it may be cost-effective to replace Metscan meters with radio based meters as part of transition strategy. Has the Company gone forward with this transition strategy? Identify the number of functional inside meters that have been replaced with radio based meters and the costs associated with such replacements.

AG-21-19 Describe the steps taken by the Company and or the manufacturer of Metscan to weatherize the meter reading devices. Identify the average actual life of the Metscan meter reading devices deployed by the Company throughout the 1990's.

AG-21-20 Describe the Company's technical support and service plan for the Metscan devices that are still in use today.

AG-21-21 Provide all reports, memorandum and analysis referring to the quality of service experienced by the Company and other utility companies regarding the Itron meter reading technology.

AG-21-22 Provide all company memoranda relating to the Company's RFP issued prior to deciding to deploy the Itron technology. Identify all other meter reading technology available to the Company when it made the decision to deploy the Itron meter reading system.